

## **EXHIBIT B**

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

JULIE DALESSIO, an individual,  
Plaintiff,  
v.  
UNIVERSITY OF WASHINGTON,  
Defendant.

No. 2:17-cv-00642-MJP

INITIAL DISCLOSURES

In accordance with Rule 26(a)(1) of the Federal Rules of Civil Procedure, Plaintiff,  
Julie Dalessio, respectfully makes her mandatory disclosures as follows:

**A. Witnesses**

The name and, if known, the address and telephone number of each individual likely  
to have discoverable information that the disclosing party may use to support its  
claims or defenses, unless solely for impeachment, identifying the subjects of the  
information.

(nn). Emily Militoni  
 1172 Burnt Sky Ave.  
 Las Vegas, NV 89183  
 (808) 225-3385

Daughter of Ms. Dalessio. She was visiting in Seattle when Mr. Betz tried to use the public records in court he received from the UW concerning Ms. Dalessio. Ms. Militoni has seen first-hand the emotional toll, physical effects and the degradation of Ms. Dalessio's quality of life after the release of her private and confidential information.

(oo). Terrilyn Heggins  
 1066 S. 320th St. Apt. C105  
 Federal Way, WA 98003  
 (206) 294-0609

Ms. Heggins is a close family friend who witnessed when Mr. Betz tried to use the public records in court he received from the UW concerning Ms. Dalessio. Ms. Militoni has seen first-hand the emotional toll, physical effects and the degradation of Ms. Dalessio's quality of life after the release of her private and confidential information.

(pp). Diana Gay  
 2424 S. Irving St.  
 Seattle, WA 98144  
 (206) 658-7712

Ms. Gay is a close family friend who witnessed when Mr. Betz tried to use the public records in court he received from the UW concerning Ms. Dalessio. Ms. Militoni has seen first-hand the emotional toll, physical effects and the degradation of Ms. Dalessio's quality of life after the release of her private and confidential information.

(qq). Paul Swan  
 113 Hobbie Creek Canyon  
 Springville, UT 84663  
 (801) 362-8826

Mr. Swan is the brother of Ms. Dalessio. He was visiting in Seattle when Mr. Betz tried to use the public records in court he received from the UW concerning Ms. Dalessio. Ms. Militoni has seen first-hand the emotional toll, physical effects and the degradation of Ms. Dalessio's quality of life after the release of her private and confidential information.

## **B. Documents**

A copy of, or a description by category and location of, all documents, electronically stored information, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment information.

- PACER Quarterly Invoice - \$22.20.

Respectfully submitted this 17th day of May, 2018

Law Office of Joseph Thomas

/s/ Joseph Thomas  
Joseph Thomas, WSBA 49532

### **Certificate of Service**

I hereby certify that on 17<sup>th</sup> of May, 2018, I serving this document through electronic mail to Ms. Jayne Freeman and Mr. Derek Chen who represents the named Defendants in this lawsuit.

/s/ Joseph Thomas  
Joseph Thomas, WSBA 49532  
14625 SE 176<sup>th</sup> St., Apt. N101  
Renton, WA 98058  
(206) 390-8848